



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANASTASSIA KREZOUNB,
aka "Sylvia Kass,"

Defendant.

SACR 8:23-cr-00042-CJC

I N D I C T M E N T

[18 U.S.C. § 2261A(2)(B),
2261(b)(5): Stalking;
18 U.S.C. § 875(d): Transmitting
Interstate Communications with
Intent to Extort]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2261A(2)(B), 2261(b)(5)]

1. Beginning on or about November 29, 2021, and continuing to March 23, 2023, in Orange County, within the Central District of California, and elsewhere, defendant ANASTASSIA KREZOUNB, also known as "Sylvia Kass" ("KREZOUNB"), with the intent to harass and intimidate the Victim, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely email, interstate wires, and the Internet, to engage in a course of conduct, described in paragraph 2 below,

1 that caused, attempted to cause, and would reasonably be expected to
2 cause substantial emotional distress to the Victim.

3 2. Defendant KREZOUNB's course of conduct included, among other
4 things, the following:

5 a. On or about November 29, 2021, defendant KREZOUNB
6 texted the Victim and demanded that he take her shopping.

7 b. Between on or about November 29, 2021 and December 11,
8 2021, defendant KREZOUNB sent the Victim hundreds of harassing texts
9 that disparaged the Victim and other individuals.

10 c. On or about December 12 and December 14, 2021, after
11 the Victim told defendant KREZOUNB to stop contacting him, defendant
12 KREZOUNB started to send harassing texts to the Victim from three
13 different phone numbers.

14 d. On or about December 14, 2021, defendant KREZOUNB
15 texted the Victim, stating, "You think I make scandals to men who
16 treat me properly?" and "I'll find your enemies and will be very
17 friends with them."

18 e. On or about December 16, 2021, defendant KREZOUNB filed
19 a police report against the Victim, accusing him of taking photos
20 without her consent.

21 f. On March 23, 2022, defendant KREZOUNB filed a second
22 police report against the Victim, accusing him of a crime.

23 g. On or about June 29, 2022, defendant KREZOUNB texted
24 the Victim threats to injure another person and back-to-back text
25 messages stating, "Get out of the building" and "Before it gets blown
26 up LOL."

1 h. On or about June 30, 2022, defendant KREZOUNB texted
2 the Victim a message, stating, "Only thing that excite me is kick
3 your ASS Burn your house in [city]."

4 i. On or about August 31, 2022, defendant KREZOUNB sent
5 the Victim's employer an email, titled "[Victim's first and last
6 name] | SEXUAL ASSAULT BATTERY, solicitation, audio depositions,"
7 which contained screenshots of a police report defendant KREZOUNB
8 filed against the Victim.

9 j. On or about September 11, 2022, defendant KREZOUNB sent
10 the Victim's employer an email, titled "[Victim's first name]
11 solicits to prostitution girls," which contained screenshots
12 of text messages between KREZOUNB and the Victim, a pornographic image
13 of male genitalia, and a screenshot of a portion of the police report
14 defendant KREZOUNB filed against the Victim.

15 k. On November 19, 2022, defendant KREZOUNB sent the
16 Victim's employer an email, titled "[Victim's first name] LOVES ANAL
17 AND ** POOP FETISHES," which included a pornographic image of two men
18 engaging in sexual activity.

19 l. On or about December 3, 2022, defendant KREZOUNB texted
20 the Victim a message threatening his reputation, stating, "All of you
21 will be embarrassed on fucking National TV CNBC, CNN,
22 Bloomberg, Yahoo TV."

23 m. On January 12, 2023, defendant KREZOUNB sent the
24 Victim's employer an email, titled "[the Victim's first and last
25 name] RAPED MY BRUTALLY."

26 n. On or about January 25, 2023, defendant KREZOUNB texted
27 the Victim a message demanding that the Victim buy her luxury items
28 or else he would face a "sex scandal at your kids graduation."

1 o. On or about February 8, 2023, defendant KREZOUB texted
2 the Victim a message, stating, "Condo or I fuck up your life."

3 p. On or about February 14, 2023, defendant KREZOUB
4 texted the Victim a message, stating, "I want \$1M minimum of gifts.
5 Or i fuck the shit off you embarrassing the fuck out of your ass."

6 q. On or about March 1, 2023, defendant KREZOUB texted
7 the Victim a message, stating, "I want a condo. If I file a lawsuit
8 against you, you will never work anywhere. . . . Not even McDonald's
9 would hire you."

10 r. On or about March 4, 2023, defendant KREZOUB texted
11 the Victim a message, stating, "I'm better than a Porsche, give more.
12 Spend more on me than on a car fucker. Or I fuck the shit out of
13 your life. I'm not kidding you at all."

14 s. On or about March 16, 2023, defendant KREZOUB sent the
15 Victim a text message, stating, "You want another round of emails at
16 [Victim's employer]? How did it go at [Victim's employer]
17 when they received the emails? Would have LOVED to see your face."

COUNT TWO

[18 U.S.C. § 875(d)]

Beginning on or about February 8, 2023, and continuing until on or about February 11, 2023, in Orange County, within the Central District of California, and elsewhere, defendant ANASTASSIA KREZOUB, also known as "Sylvia Kass" ("KREZOUB"), knowingly and with the intent to extort money and other things of value from the Victim, transmitted in interstate commerce communications that contained a true threat to injure the reputation of the Victim and other individuals, that is, defendant KREZOUB threatened to distribute

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1 sensitive and harmful information about the Victim and other
2 individuals, and defendant KREZOUN threatened to accuse the Victim of
3 a crime, if the Victim did not transfer money or other things of
4 value to defendant KREZOUN.

5 A TRUE BILL

6
7 /s/
8 _____
Foreperson

9 E. MARTIN ESTRADA
United States Attorney

10 
11

12 ANNAMARTINE SALICK
Assistant United States Attorney
13 Chief, National Security Division

14 CAMERON L. SCHROEDER
Assistant United States Attorney
15 Chief, Cyber & Intellectual
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16 KHALDOUN SHOBAKI
Assistant United States Attorney
17 Deputy Chief, Cyber &
18 Intellectual Property Crimes
Section

19 ANDREW M. ROACH
Assistant United States Attorney
20 Cyber & Intellectual Property
21 Crimes Section